

4. Throughout my employment at STC, I experienced sexual harassment and discrimination on a regular basis that was offensive, severe, and pervasive. One of my male colleagues told me “I am going to bend you over my knee and spank you, and you will like it” and when training me on cleaning a tool, referred to part of it as “the pussy” which needed to be cleaned

by “thrust[ing] in and out,” and then degradingly telling me, I knew “all about this.” Another male colleague told me that I was “one of those girls working in the oilfield, trying to sleep around with men out here.” Yet another male colleague asked me what “special favors” (meaning sexual favors) I had performed to advance my career. I was also told that a company man, who would not call me by my name, did not want a woman on the rig, and learned that he requested I be replaced by a man. Another colleague told me that I was “asking for it” (meaning sexual harassment) by wearing shorts on the rig. I was regularly demeaned and treated as inferior by male employees, including (as discussed below) being called “illiterate,” and told that I “did not deserve” to be on a rig and would “not make it.”

5. The sexual harassment I experienced (including the demeaning, humiliating, and offensive comments based on my gender) interfered with my ability to perform my work. I felt ashamed, embarrassed, and degraded by the harassment and discrimination. And it was humiliating to be subjected to sexual harassment in front of my colleagues. No one should have to experience the distressing and hostile conditions that I did at Schlumberger.

6. As I stated during my deposition, my experiences at Schlumberger made me feel “[l]ike I failed. Like any confidence in me has just been taken from me. That it’s the good boy system or culture and I should just keep my head down and my mouth shut and just take[n] it . . . thinking I ruined my own career because I sp[oke] up . . . But somebody has to stand up for us. This is an industry that I am most passionate about. But it is horrible to work for a company as such as Schlumberger to allow these acts to happen.” (Jessica Cheatham Dep. at 242:12-243:23.)

While on the X-48 (Chevron Rig) from July 2019 through September 2019

7. In the summer 2019, I was working as a Grade 9 DX¹ on the X-48 Chevron rig. I reported discrimination on two separate occasions on this rig.

8. In July 2019, a male Directional Driller named Brian Guilbeau (“DD Guilbeau”) told me that I was “fucking illiterate” in front of multiple coworkers. I understood that this comment—which publicly accused me (the only woman) of being stupid—was based on the fact that I am a woman, especially because DD Guilbeau always treated the men working on the rig with professionalism and respect. I complained about DD Guilbeau’s comment to several STC employees, including Workforce Coordinator Jermaine Allen (“WFC Allen”) and Products Service Delivery Manager (“PDSM”) Dana Lasher (“PSDM Lasher”). As far as I know, none of them investigated my complaint or elevated it to Human Resources.

9. On September 4, 2019, I asked Directional Driller Stephen Laroux (“DD Laroux”), another male DD on X-48, a question about bottom hole assembly. Even though he was tasked with assisting me, he refused, telling me that he “didn’t see me making it out here working on this rig as a DX.” This comment was incredibly offensive and discriminatory; DD Laroux did not treat his male colleagues this way.

10. No more than a few hours after the incident on September 4, I complained to PSDM Lasher about DD Laroux’s discriminatory treatment. PSDM Lasher did not address my complaint or respond to my allegations. Instead, he accused me of not driving appropriately when I returned to the rig after collecting a tool from another rig (the X-16 rig). During that drive, I approached X-16 at around 5 to 7 mph, stopped the truck, got a level, and then drove back to X-48. This was a minor incident; I had previously observed DD Laroux pulling up to a rig at the same speed as I

¹ As a “DX”—or cross-trained field engineer—I could perform both the role of a D&M Field Engineer–Measurements (or “MWD”) and a Directional Driller (or “DD”).

had been driving. (Mr. Laroux was not banned from Chevron rigs for his driving.) After the call with PDSM Lasher in which I reported gender discrimination, I sent him a text message apologizing for this minor driving incident.

11. PDSM Lasher never acted on my complaint about DD Laroux.

12. On September 6, 2019, another male rig worker (Dominic Nolfi) told me that I was being banned from working on Chevron rigs. He told me that he heard this directly from PDSM Lasher, who had told him I would no longer be allowed back on the Chevron rigs. During that conversation, Mr. Nolfi also mentioned that he had heard something from PSDM Lasher about my complaint regarding DD Laroux.

13. I subsequently talked to WFC Allen. During that conversation, I complained to WFC Allen about DD Laroux's discriminatory behavior towards me and asked whether what Mr. Nolfi said was true. WFC Allen confirmed that I was no longer going to be staffed on Chevron rigs.

14. Later that day, I complained about DD Laroux's discriminatory treatment to DD Field Supervisor Hank Hebert, who acknowledged that the incident was gender discrimination and encouraged me to report it.

15. On September 7, 2019, I filed an EthicsLine complaint to report DD Laroux's discriminatory conduct and PDSM Lasher's retaliation towards me.

16. On September 10, 2019, I finished my assignment on X-48.

17. Had STC not banned me from Chevron rigs, I would likely have continued to work on Chevron rigs after the X-48 assignment.

From September 11, 2019 Through January 2, 2020, I Was Not Staffed On Any Rig.

18. After September 10, 2019, STC never staffed me on another rig again. Before filing my EthicsLine complaint, I was regularly and consistently staffed to rigs. Typically, I received my new rig assignments during or shortly after completing my current rig assignment.

19. With brief limited exceptions—for example, when I needed to help my ailing grandmother—I was available to work on a rig during September through December 2019. Throughout this time, I tried to get staffed to a rig, but it was to no avail.

20. I am aware of several male field personnel in Drilling & Measurements (“D&M”) who were staffed on rigs during the time period of September through December 2019. For example, I know that Temitope (“Tope”) Adekola, Edgar Caballo, Stephen Laroux, Michael Moore, Nathan Martin, Tony Ramos, Brandon Swann, and Owen Shropshire all received rig assignments during that time period.

21. Schlumberger’s refusal to staff me on rigs also prevented me from achieving my Grade 10 promotion. Specifically, I needed to have additional field experience with the rotary system tool — *i.e.*, get some additional “RSS runs” — before being promoted to Grade 10. Due to not being staffed to a rig, I did not receive the RSS runs.

22. During this time that I was not staffed to rigs, I continued to complain about the discrimination and harassment that I had experienced. For example, around October 2019, I complained to North America Land HR Manager Joya Bradley, Permian Basin HR Services Manager Jarrien McCoy, and Resource Manager Nadim Mikati. I also complained to HR Representative Fernando Ojeda Garcia about “everything [I] had to put with” while working “with a field of guys that [would] never change.” Despite my many complaints, nothing improved.

Grade 99 MWD Demotion in Alaska

23. On November 18, 2019, STC offered me a D&M Field Engineer-Measurements (Grade 99) position in Alaska. This job would have been a demotion, both in position and compensation. Multiple STC employees (including WFC Allen, Field Development Engagement Manager Alessandra Ruy, my manager Colby Broussard, Field Development Engagement Manager Lindsey Keith, and NAL HR Manager Joya Bradley) all pressured me to accept this position. I declined because it would have been a demotion.²


24. I know that there were male field personnel in D&M who were not offered a demotion during this time period. For example, Tope Adekola, who was a DX like me, was not offered a demotion.

Constructive Discharge

25. As I stated during my STC exit interview, I had hoped to retire at STC. However, after not being staffed to a rig for more than three months and being pressured to accept a demotion, on December 20, 2019, I gave my two-weeks notice that my last day of employment at STC would be January 2, 2020. At this point, I had suffered years of discrimination, harassment, and retaliation, and now was not even able to work without accepting a demotion. It was clear to me I had no future at STC and was thus, forced to resign.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 3, 2022


Jessica Cheatham (Nov 3, 2022 12:05 CDT)

Jessica Cheatham

² In a text message sent to me on December 5, 2019, DX Tope Adekola agreed with me, saying “It’s the hourly stuff [offered for the Alaska position]. It’s like a demotion.”